NOV 30 1988

EXPRESS MAIL
RETURN RECEIPT REQUESTED

Mr. Bruce Jernigan
Browning Ferris Industries
P.O. Box 3151
Houston, TX 77253

Re: SCP-Carlstadt Site

Dear Mr. Jernigan:

This is to confirm discussions which took place at our meeting on November 21 at EPA's offices in New York City, during which we discussed various issues relating to the completion of the On-Site Source Control Feasibility Study (FS) for the SCP-Carlstadt Site (the site).

At that meeting, EPA again informed you that the first operable unit remedy for the site (and therefore the On-Site Source Control FS) will address contaminated soils and groundwater located above the clay layer at the site (i.e., the top ten to twenty foot strata across the site). As there are high levels of all classes of chemicals (including hazardous substances) in the soils and groundwater in this surface stratum, we all agreed it is unlikely that one particular technology will by itself mitigate this contamination; rather, it is likely that a series of different processes will be combined to remediate the soils and groundwater at the site.

EPA reiterated that it will not tolerate a delay in completion of the On-Site Source Control FS due to the Technical Committee's decision to hire a new consultant (ERM) to complete the study. EPA stated that because Dames & Moore has already performed a substantial amount of work toward completing the On-Site Source Control FS, it is imperative that ERM work closely with Dames & Moore and review the work which has been completed to avoid duplication of efforts.

Following a review of EPA's definition of the first operable unit for the site, we discussed the schedule for completion of the On-Site Source Control FS. EPA stated that the draft On-Site Source Control FS should be submitted by no later than mid-January. ERM representatives then expressed their view that they could not deliver a technically supportable draft On-Site Source Control FS for the first operable unit by mid-January. Their preference would be to perform focused treatability studies for a group of select technologies. After further discussion regarding treatability studies which may be necessary to produce a technically supportable On-Site Source Control FS, EPA stated that the Agency may allow the Technical Committee to complete the

On-Site Source Control FS provided at least the following conditions are met:

1. The Technical Committee agrees to submit an On-Site Source Control FS to EPA by no later than April 1, 1989. ERM will conduct all treatability studies and all other studies necessary to produce a technically supportable On-Site Source Control FS by April 1, 1989; and

2. The existing Administrative Order, Index No. II-CERCLA-50114, is amended, with Respondents' consent, to reflect the above deadline and to revise the penalty provisions and any other provision(s) requested by EPA.

We agreed to meet again on Friday, December 2, 1988, at 1:00 p.m., at EPA's offices in Edison, New Jersey. At that time, EPA expects to be informed whether the Committee will complete the On-Site Source Control FS under the above conditions. If EPA permits the Technical Committee to complete the On-Site Source Control FS, EPA will prepare and send an amendment to the Consent Order to the Counsel for the Committee for approval.

As stated in my letter dated November 9, 1988, EPA will also expect to be informed, in writing by December 1, 1988, of the work your consultant plans to perform in completing the On-Site Source Control FS, including all treatability studies. EPA agreed to extending that date so that you can provide the proposal at our meeting on December 2, 1988.

If you have any questions regarding this matter, or the above does not reflect your understanding of the discussions at our meeting, please contact Janet Feldstein or James Schmidtberger, of my staff, at (212) 264-2646.

Sincerely yours,

Raymond Basso, Acting Chief
Site Compliance Branch

cc: Thomas Armstrong, General Electric
William Warren, Esq.
Pamela Lange, NJDEP

bcc: J. Rooney, ORC-NJSUP
J. Schmidtberger, ERRD-SCB
R. Schwarz, ERRD-NJRAB